

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS
INSTITUTE OF TECHNOLOGY,)
)
Plaintiff,)
v.)
)
HARMAN INTERNATIONAL)
INDUSTRIES, INCORPORATED,)
A Delaware Corporation,)
)
Defendant.)

Case No. 05-10990 DPW
Magistrate Judge Judith G. Dein

**ASSENTED-TO MOTION TO FILE UNDER SEAL THE UNREDACTED
MEMORANDUM OF LAW, THE UNREDACTED STATEMENTS OF FACT, AND
EXHIBITS 4, 8, 12, 13, 16, 24, 25, 27, 28, 34-36, AND 38-40 TO HARMAN'S MOTION
FOR SUMMARY JUDGMENT THAT CLAIMS 1, 42, AND 45 OF THE '685 PATENT
ARE INVALID UNDER 35 U.S.C. § 102(B) DUE TO PUBLIC USE**

Defendant Harman International Industries, Inc. ("Harman") hereby moves to file under seal until conclusion of this case, pursuant to the Parties' Stipulated Protective Order entered by the Court in this case, the full versions of the Memorandum of Law and Statements of Fact in support of Harman's Motion for Summary Judgment That Claims 1, 42 and 45 of the '685 Patent are Invalid Under 35 U.S.C. § 102(B) Due to Public Use. Redacted versions of these documents will be filed electronically and publicly with the Court. Harman requests that the full, unredacted versions be sealed until the conclusion of this case.

Harman further seeks to seal until the conclusion of the case Exhibits 4, 8, 12, 13, 16, 24, 25, 27, 28, 34-36, and 38-40 to Harman's Motion for Summary Judgment That Claims 1, 42 and 45 of the '685 Patent are Invalid Under 35 U.S.C. § 102(B) Due to Public Use.

This Motion is necessary to comply with the protections of the Stipulated Protective Order.

WHEREFORE, Harman respectfully requests that the Court enter an Order permitting Harman to file under seal the unredacted version of the Memorandum of Law, the unredacted version of the Statements of Fact, and Exhibits 4, 8, 12, 13, 16, 24, 25, 27, 28, 34-36, and 38-40 in support of Harman's Motion for Summary Judgment That Claims 1, 42 and 45 of the '685 Patent are Invalid Under 35 U.S.C. § 102(B) Due to Public Use.

Certificate of Compliance with Local Rule 7.1

Harman, by and through its attorneys, hereby certifies that it conferred with MIT's counsel on July 24, 2007, and counsel for MIT has assented to this motion.

Dated: July 25, 2007

Respectfully submitted,

/s/ Courtney A. Clark
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on July 25, 2007.

/s/ Courtney A. Clark
Courtney A. Clark